



**Garnet E. Person, CFR**  
Chief Executive Officer

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February 20, 2015

Letter of Appeal  
Schools and Libraries Division  
Correspondence Unit  
30 Lanidex Plaza West  
PO Box 685  
Parsippany, NJ 07054-0685

**Re: Letter of Appeal – Lodi Unified School District**  
**Application No. 824228 (Form 471, Funding Year 2012)**  
**Billed Entity No. 144356**  
**FRNs 2296671, 2296675, and 2354982**  
**Pacific Bell Telephone Company (SPIN: 143002665)**

Schools and Libraries Division Officer:

This Letter of Appeal addresses the Schools and Libraries Division's (SLD) decision to dismiss our request for invoice deadline extensions for FCC Form 471 824228 Funding Request Nos. (FRNs) 2296671, 2296675, and 2354982. The December 23, 2014 Administrator's Decision on Invoice Deadline Extension Request provided the following explanation

*"Current deadline extension rules and procedures do not allow approval for the reason submitted."*<sup>1</sup>

On Friday, October 24, 2014, we submitted an invoice deadline extension request via fax, which included the above referenced FRNs.<sup>2</sup> The invoice deadline extension request was necessitated by the fact the service provider did not invoice USAC via Service Provider Invoice (SPI) and provide credits on the monthly bills despite numerous requests to do so. Because Lodi Unified School District is located in California, the SPI invoicing method is necessary for proper application of California Teleconnect Fund discounts.

We respectfully disagree with the SLD's decision to dismiss the invoice deadline extension requests for FRNs 2296671, 2296675, and 2354982 based on the following premises:

1. The USAC SLD website lists the conditions under which an invoice extension can be requested.<sup>3</sup> Included in the list of conditions under which an invoice extension can be requested is "[d]ocumentation requirements that necessitate third-party contact or certification".

<sup>1</sup> See Administrator's Decision on Invoice Deadline Extension Request

<sup>2</sup> See FY2012 IDE Request.

<sup>3</sup> See USAC Invoice Extension Guidance

2. The invoice deadline extension request submitted to SLD on October 24, 2014 stated that the request was based "on the USAC condition that documentation requirements necessitated third party contacts and certification." Our opinion is that because we had requested that the service provider invoice USAC via SPI, and because we were working with them to establish the SPI invoicing process, that this condition had been met.

We respectfully submit that the situation involving FRNs 2296671, 2296675, and 2354982 met the requirements for requesting and receiving invoice deadline extensions. Therefore, based on the foregoing, under the established policies, procedures, and guidance for requesting invoice deadline extensions, we ask that SLD grant our appeal and approve invoice deadline extensions for FRNs 2296671, 2296675, and 2354982.

Sincerely,

A handwritten signature in black ink, appearing to read "Garnet E. Person", followed by a horizontal line.

Garnet E. Person  
Chief Executive Officer